

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ROCHELLE GLASGOW, et al)	CASE NO.: 5:21-CV-02001-JRA
)	
Plaintiffs,)	
)	
v.)	
)	JUDGE: DAVID A. RULZ
DANIEL J. BEERS, et al)	
)	
Defendants.)	<u>DOUGLAS BEHRENS AND SAVNET</u>
)	<u>INTERNATIONAL JOINT INITIAL</u>
)	<u>DISCLOSURES PURSUANT TO</u>
)	<u>FED.R.CIV.P. 26(a)(1)</u>
)	

Pursuant to Rule 26(a)(1) of the Federal Civil Rules of Procedure, Defendants Douglas Behrens and SavNet International LLC submit the following Joint Initial Disclosures submitting disclosures based on the preliminary review of the Complaint, Motions to Dismiss and pending the Court's determination of the Motion for More Definite Statement and reserve the right to supplement these responses during the course of proceedings.

I. Individuals Likely to Have Discoverable Information That May Be Used to Support the Claims or Defenses of Douglas Behrens and/or Savnet International LLC:

- A.** Plaintiff Rochelle Glasgow
- B.** Plaintiff William Rooker

- C. Plaintiff Donna Landry
- D. Plaintiff Bonnie Sue Martin
- E. All other named parties now or hereinafter named as Plaintiffs and/or parties to this case
- F. Dale Bellis
- G. Stephen Furst
- H. Steven Yashnik
- I. Larry Foster
- J. Druzilla Abel
- K. Dorsey Morrow
- L. Thomas Fabris
- M. Douglas Behrens
- N. Randy Foster

II. Description by Category and Location of Documents That May Be Used to Support the Liberty Defendants' Claims and/or Defenses.

Douglas D. Behrens and SavNet international LLC and their counsel are still in the process of locating and identifying potentially responsive information. Thus, this Section II is preliminary in nature and will supplement these Initial Disclosures, where and if applicable, once it has sufficient time to complete its review. The documents described below are currently copied in printed format. Additionally, Douglas Behrens and SavNet International believe that Plaintiffs as well as Liberty Defendants and Vendor Defendants all have documents that may be available for use to support the defense.

- A. Liberty HealthShare's Sharing Guidelines and related documents;
- B. Payments made by Liberty HealthShare to SavNet and providers providing services similar to those contracted with SavNet, communications between Liberty HealthShare, Plaintiffs

and other members of Liberty HealthShare and/or vendor providers providing services similar to those contracted by Liberty HealthShare with SavNet International and/or Douglas Behrens..

C. All Exhibits to the Motions to Dismiss filed by Vendor Defendants and related affidavits/briefs the Liberty Defendants filed in this case.

D. Documents related to Liberty HealthShare's status as a healthcare sharing ministry under the Affordable Care Act including communications

E. Liberty HealthShare Requests for Proposals to potential Vendors for services prior to May, 2016 and responses received by Liberty HealthShare.

F. Amended and Restated Operating Agreement of SavNet International dated on or about September 1, 2016.

G. Action by Members of SavNet International relating to Health Savings Discount dated September 1, 2016.

H. Activity filed with the Secretary of State of Ohio and maintained as a matter of public record relating to Corporations and entities bearing Charter Numbers 2115887, 1192149,

I. Discount Aggregate Program Marketing Agreement SavNet International and Alliance HealthCard of Florida, Inc. date July 1, 2016 and First Amendment dated October 1, 2017,

J. SavNet Overview Offering submitted to Liberty HealthShare prior to July 1, 2016.

K. Discount Program Agreement dated September 1, 2015 between Envision Medical Solutions and MedCost Solutions LLC to enroll participants of Liberty HealthShare for discount health service products;

L. Health Savings Discount Program Affinity Agreement dated September 1, 2016 between SavNet International and MedCost Solutions LLC to distribute to Participants enrolled in the Liberty HealthShare program.

M. Pharmacy Services Agreement dated September 1, 2016, between SavNet International and the National Coalition of HealthCare Sharing Ministries Inc.

Respectfully submitted,

/s/ Thomas F. Haskins, Jr.

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Attorney for Defendant, Douglas Behrens

CERTIFICATE OF SERVICE

The undersigned Attorney for Defendants Douglas D. Behrens, Savnet International, LLC hereby certifies that on this 17th day of July, 2022, a true and accurate copy of the foregoing *Initial Disclosures submitted jointly by SavNet International and Douglas Behrens* was served via email pursuant to Fed.R.Civ.P. 5(b)(2)(E), upon the following counsel of record;

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